



Health & Safety in Schools

Second follow up review

**November
2019**



**Medium
Assurance**

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Purpose & Background Information

Our original review of Health and Safety arrangement in schools was completed in June 2018 giving a low assurance rating due to the lack of evidence to demonstrate that staff had received the relevant health and safety training, there was no formal mechanism to record when high priority actions identified during school visits carried out by the Corporate Health and Safety team were completed, not all schools were in receipt of a fire risk assessment dated within the last three years and there were inconsistencies across schools in having infection control plans in place.

The first follow up identified that good progress had been made to address the risks issues identified. This second follow up review is to establish what progress has made to address the issues that remained incomplete after our first review.

It should be noted that the updated opinion is based on the assumption that systems and controls as previously identified during the original audit remain in operation and are being complied with in practice. The purpose of our follow up exercise is not to retest the operation of controls which have already been assessed, but to review how management has responded to the action plans following our initial work.

Audit Opinion

This review highlighted that some progress has been made in addressing one of the three actions outstanding.

There have been delays in progressing the action tracker, which will provide the function to record and monitor the actions and their status. This action is currently with the Information Communication Technology (ICT) team, who in the process of recruiting staff to complete the development of the tracking system. Until the tracker system has been developed and implemented, Corporate Health and Safety Team are continuing to manually monitor progress on actions and have regular communication with the schools on priority actions.

Human Resources (HR) have provided schools with support and guidance on corporate induction, which encompasses health and safety training. Awareness of health and safety should improve with the roll out of the eLearning modules that all staff are required to complete. Ongoing monitoring of the completion of the eLearning modules is carried out by HR, who feedback to individual schools and the Head of Education and Children's Services.

Given the delays in the delivery and implementation of the action tracker a further follow up will be required. Based on the results of the second follow up we are providing a 'medium' assurance.

| Audit Opinion as at June 2018 | Audit Opinion as at May 2019 | Audit Opinion as at November 2019 | Direction of Travel |
|-------------------------------|------------------------------|-----------------------------------|---|
| Low Assurance | Medium Assurance | Medium Assurance |  |

Action Plan

Audit Follow-up Review of: **Health & Safety in schools**
Date: **November 2019**
Action Plan Contacts: **Corporate Health & Safety Manager**

| Progress with Implementing Agreed Actions | | |
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| Previous | Current | Risk Rating |
| 0 | 0 | Critical |
| 1 | 0 | Major |
| 4 | 2 | Moderate |

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| Risk Issue 1 | There is no formal mechanism in place corporately for recording the status of actions raised as part of the inspections and assessments carried out by the Corporate Health and Safety team. | | |
| Underlying Weakness | <p>The Corporate Health and Safety team carry out the following inspections and assessments of school premises: –</p> <ul style="list-style-type: none"> • General health and safety inspections with involvement from the schools. These cover different themes i.e. in 2017/18 focused on policies and procedures and in 2018/19 the focus will be on cleaning standards. • Fire Risk Assessments. <p>Although improvement actions which are identified to address any issues are formally reported to the school, there is no process/system in place centrally to record that the necessary actions have been implemented. Although the school has a role to address the actions, the Council, as landlord, also has a role to maintain school buildings. The Health & Safety team follow up priority issues based on their significance and the resources available but are not currently recording any progress or updates.</p> | | |
| Action (Ref) | Agreed Management Action | Responsibility & Deadline | Status |

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| 1.1 | Meet with ICT to discuss and implement an action tracking system for the recording of “recommended actions” with the agreed timescales. The recipients of the “recommended actions” to respond to the Corporate Health and Safety Team within a given timescale. The system will include iterative reminders from the system and escalation triggers as part of the process. | Corporate Health & Safety Manager & ICT Business Partner for Service by 30/03/2019 | In progress – revised date 31/8/2019 |
| First Follow Up – Results | Due to capacity issues within ICT this action had been delayed. Corporate Health and Safety team met with the Senior Business Systems Officer, ICT in April 2018 to discuss the requirements of the required system, where a possible solution was discussed but needed further investigation was needed. An amended timescale have been provided for 31/08/2019 has been provided. | | |
| Second Follow Up – Results | The specification has been finalised with the service and ICT are currently awaiting capacity amongst their Developers to write the solution. Most of the Development resource has been assigned to another Corporate project and are currently in the process of recruiting a temporary post to replace some capacity within the team. Once this recruitment has been concluded, ICT will be in a position to assign the work and identify a revised target implementation date | | |
| 1.2 | Internal Audit to attend a future Business and Finance Managers meeting to highlight the responsibility of the schools for updating the status of actions arising from inspections. | Internal Audit Services by 30/09/2018 | Complete |
| Follow Up Results | Internal Audit attended the Business and Finance Managers meeting on 10 th September to raise awareness of the risks issues identified during the review and the areas that school have responsibility for. Feedback has been provided by one Business Manager within one school cluster advising of the communication held with the schools. | | |
| 1.3 | Schools to advise Corporate Health and Safety on the progress/status of actions resulting from the Corporate Health and Safety inspections. | All School Head teachers by 30/03/2019 | In progress |
| First Follow Up – Results | The Corporate Health and Safety team have noticed an improvement in the communication from schools, in particular with the Business and Finance managers for the clusters in the status of actions from the inspections carried out. | | |

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| | Once the new system has been implemented the Corporate Health and Safety team will be able to measure more accurately how well the schools are advising them on progress on the required actions. |
| Second Follow Up – Results | <p>The Action tracker system has not yet been developed or implemented to schools to update the progress on the improved actions. See Action 1.1 for the update on the process.</p> <p>Progress with addressing the actions arising from Health and Safety Inspections are subject to on-going monitoring carried out by the Corporate Health and Safety and this will continue until the action tracker is in place.</p> |

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| Risk Issue 2 | Some schools' fire risk assessment may no longer be relevant as they have not been reviewed within the last three years. As a result, there is potential that fire safety measures are inadequate. | | |
| Underlying Weakness | <p>The Regulatory Reform (Fire Safety) Order 2005 states that fire risk assessment must be reviewed and updated by a responsible person on a regular basis or where there has been significant changes to the premises. Although the legislation does not specify the frequency of fire risk assessments, the Corporate Health & Safety team aim to carry out a fire risk assessment every three years. The team is undergoing a programme of updating schools' fire risk assessment; however, testing shows that there are a number of schools who have not had their fire risk assessment updated within the set target period. At the time of our review, of the 65 school sites¹:</p> <ul style="list-style-type: none"> • 5 were assessed in 2018. • 25 were assessed in 2017. • 11 were assessed in 2016. • 11 were assessed in 2015. • 10 were last assessed in 2014. Although four of these school sites are due to be updated this year, at the time of our review there were no planned dates for the remaining seven schools. • 3 relate a new school sites or classroom that have not yet been assessed. <p>Where fire risk assessments are not up-to-date and adequate and appropriate fire safety measures are not put in place (see Risk Issue 1 above), there could be greater risk of injury or loss of life in the event of a fire.</p> | | |
| Action (Ref) | Agreed Management Action | Responsibility & Deadline | Status |
| 2.1 | We will add extra resource into the process to bring all school FRA's within a three year period. This resource will be taken from other activities in a balanced manner. We will maintain our target of three yearly FRA reviews where resources permit. | Corporate Health & Safety Manager by 30/03/2019 | Complete |

¹ Although there are 58 schools in Denbighshire, some have more than one site, giving a total of 65 school sites.

**Follow Up
Results**

The Corporate Health and Safety Manager advised that all schools now have up to date fire risk assessments in place within the last two years. Officers within the team carried out fire risk assessments for schools and other civic sites e.g. leisure centres and libraries.

Since the original review fire risk assessments will now be carried out by the Property Health and Safety team where an officer with the team carrying out the fire risk assessments within their remit. The completed fire risk assessments will be recorded on the Technology Forge system, which will provide prompts of when actions are due to be completed and when the fire risk assessments are due.

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| Root Cause 3 | Some schools are not using the corporate system for recording accidents or incidents which have occurred on school premises. | | |
| Underlying Weakness | <p>Analysis of the corporate system for recording accidents and incidents shows that 20 out of 58 schools (34%) have not recorded any accidents or incidents. Our sample testing confirms that schools are recording accident & incidents locally which complies with legislation as it does not specify how accidents and incidents should be recorded. However, this means that the Corporate Health & Safety team has difficulty monitoring all accidents and incidents that have occurred on school premises to gauge any emerging trends, enable monitoring by the Corporate Health & Safety Committee and ensure that serious accidents and incidents are reported to the HSE under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR) 2013.</p> <p>The Corporate Health and Safety team as part of their role has advised the schools but cannot force the schools to record accidents and incidents on the corporate system.</p> | | |
| Action (Ref) | Agreed Management Action | Responsibility & Deadline | Status |
| 3.1 | School Support team to include “accident incident reporting” to the self-assessment reporting tool for schools used by Education. | Principal Manager– Modernising Education by 30/03/2019 | Complete |
| Follow Up Results | Question now included on the self-assessment reporting tool for schools to complete. Monitoring of the responses will be carried out through the self-evaluation tool. | | |
| 3.2 | We will continue to regularly communicate the requirements for accident incident reporting to school responsible persons through training, Health and Safety attended, Education Health and Safety committee and Business & Finance Managers meetings. | Corporate Health & Safety Manager by 30/03/2019 | Complete |

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| <p>Follow Up Results</p> | <p>Report provided by Corporate Health and Safety Manager demonstrated that there have been an increase in the reporting of accident and incident reporting by 26%. This indicates that more accidents and incidents have been reported to the Corporate Health and Safety team. The communication of the importance of reporting of accidents and incidents has been carried out through the following steps: –</p> <ul style="list-style-type: none"> • Follow up discussions with line managers (including head teachers and business and Finance Managers where incidents were highlighted and not reported. 2 schools were included in the sample of incidents not reported. • Discussions in health, safety and wellbeing courses • Newsflashes and quarterly newsletters • Regular monitoring visits and face to face discussions. • The number of accidents and incidents reported in 2018–19 was 338 in comparison with 230 in 2017–18. | | |
| <p>Risk Issue 4</p> | <p>Not all schools were able to demonstrate that staff have attended the required Health and Safety training courses.</p> | | |
| <p>Underlying Weakness</p> | <p>Analysis of iTrent (HR system) and discussion with a sample of Head teachers identified that not all schools are using iTrent as the recording mechanism for recording training courses, in particular health and safety courses. There was evidence on iTrent that school representatives have attended a range of health and safety courses (53 out of 58 schools); however, records show that some school employees had not attended the relevant courses for their role, for example a Head teacher is required to attend the ‘Managing Safely’ course. The only other mandatory course that all staff should attend is the induction course, which covers Health and Safety.</p> <p>The sample of five schools tested confirmed that they all provide the mandatory induction training course which includes Health and Safety; however, only one school was able to evidence this.</p> <p>The Corporate Health and Safety team advises the schools of the available courses but it is each school’s responsibility to ensure that the relevant staff attend the recommended courses.</p> | | |
| <p>Action (Ref)</p> | <p>Agreed Management Action</p> | <p>Responsibility & Deadline</p> | <p>Status</p> |

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| 4.1 | School Support team to include “Health & Safety course” to the self-assessment tool ‘School Management Review’. This is monitored by the Education Support team and highlight any schools that have not attended the appropriate training. | Planning & Resources Manager (Education) by 30/3/2019 | Complete |
| Follow Up Results | Questions have now included on the self-assessment reporting tool for schools to complete. Monitoring of the responses will be carried out through the self-evaluation tool. | | |
| 4.2 | Schools to use the corporate induction template provided by HR and incorporate the Health and Safety checklist template provided by Corporate Health and Safety to devise their own in-house induction for all new staff within their schools. This document will also assist with ensuring that all corporate mandatory training is covered during the induction period. | All School Head teachers by 30/3/2019 | In progress - revised follow up date 31/9/19. |
| First Follow Up – Results | <p>Testing of 7 schools identified that schools have been using the HR template provided to record that new staff have received the induction training including a basic awareness of the health and safety arrangements at schools either through the induction process or as a current member of staff. The results are below: –</p> <ul style="list-style-type: none"> • 2/7 schools have used the induction template for new staff at the schools and have formally recorded the • 2/7 advised that staff have received training as part of the induction process or through the health and safety awareness training but did not retain a formal record to demonstrate staff have received the relevant training and information relation to health and Safety awareness. • 3/7 did not responded <p>Further promotion is required to ensure that the corporate templates are used as part of the induction process to ensure all staff received the mandatory information on health and safety and records are retained as confirmation of attendance at the health and safety awareness training.</p> | | |
| Second Follow Up – Results | HR have distributed the corporate induction templates to all schools, which covers health and safety awareness as well as the corporate induction checklist that each school can tailor to reflect its own individual setting. | | |

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| | <p>HR have carried out the following steps to promote induction training: –</p> <ul style="list-style-type: none"> • Attended a Business and Finance Managers meeting to promote the training and emphasise the importance of completing the training. • Maintain regular contact with schools verbally and in writing for the promotion of training. Following this, some schools are planning to include Health and Safety training as part of the staff training days. • Emails to head teachers promoting the training available. • Provide training booklets for schools for ease of access to the information • Reduce the number of areas to be included in the eLearning module to ensure only key information is provided allowing staff to complete the modules in a shorter period. <p>As the relevant information has been provided to the schools, the reliance is now on the schools to raise staff awareness. Alongside the rollout of the eLearning modules that all school based staff are required to complete the awareness of corporate training, including health and safety should improve.</p> | | |
| 4.3 | <p>Internal Audit presented the results of this review at the Heads of Clusters meeting in May 2018 and each Head teacher that was in attendance at the meeting was required to feedback to their school clusters that all staff must attend the relevant Health & Safety training and maintain formal training records.</p> | <p>All School Head teachers by 30/3/2019</p> | <p>Complete – ongoing</p> |
| Follow Up Results | <p>The training carried out in the schools for health and safety awareness for 2018–19 was 458 members of staff (34 schools), which the Corporate Health and Safety team provided in comparison with 27 schools in receipt of health and safety awareness training in 2017–18. There are 10 schools in total who have received health and safety awareness by from the Corporate Health and Safety team.</p> <p>As part of the testing of the 7 schools we also received confirmation from schools that staff had attended health and safety awareness training, the results are below: –</p> <ul style="list-style-type: none"> • 6/7 have attended health and safety awareness training provided by the Corporate Health and Safety Team between 2017–18 and 2018–19. | | |

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| | <ul style="list-style-type: none"> 1/7 schools has not received health and safety awareness training by the Corporate Health and Safety Team between 2017-18 and 2018-19. <p>The increase in the training at schools has been as a result of the promotion of health and safety awareness courses through monitoring visits carried out by the Corporate Health and Safety team.</p> |
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| Risk Issue 5 | Some schools have not implemented an infection control plan which sets out controls to address associated risks. | | |
| Underlying Weakness | <p>Our sample testing highlighted some schools without an infection control plan in place. The purpose of an infection control plan is to identify various infections and illnesses and the controls required to address the associated risks. This is particularly advisable given the recent outbreaks at a few schools within Denbighshire.</p> <p>The Healthy Schools Co-ordinator is in the process of working with schools to raise awareness of the importance of having infection control plans in place.</p> <p>Note: The Corporate Health & Safety team in co-ordination with the Council's Cleaning Services team and the Healthy Schools Co-ordinator will review the risk of infection at schools in 2018/19.</p> | | |
| Action (Ref) | Agreed Management Action | Responsibility & Deadline | Status |
| 5.1 | Create relevant questions relating to infection control plans and cleanliness. The questions will be available for all schools to answer on the self-assessment tool 'School Management Review' in terms of what arrangements are in place. The information will then be analysed and a minimum level of quality assurance will be agreed for relevant officers to carry out spot checks of a sample of schools. | Principal Manager - Modernising Education and Healthy Schools Co-Ordinator by 31/12/2018 | Complete - Ongoing |
| Follow Up Results | Questions have been added to the self-evaluation tool for schools to complete as part of their role. The Healthy Schools Co-Ordinator has analysed the information completed to date and will be contacting the individual schools where there are responses under the 'acceptable' or 'priority for improvement' categories | | |

The Healthy Schools Co-Ordinator has provided support to schools to manage infection control, where the Healthy Schools Co-Ordinator has been working with the schools in ensuring schools have a good understanding of the purpose of infection control plans. Training has been provided for schools and will be provided on an annual basis to ensure all schools have a continued good understanding of the infection control processes.

The testing of the seven schools identified that 6/7 had infection controls plans in place for their schools. This demonstrates an improvement on the previous testing where only 2/5 schools have an infection control plan in place.

Report Recipients

- Chief Executive Officer
- Corporate Director: Economy and Public Realm
- Corporate Director Communities
- Head of Facilities, Assets & Housing
- Head of Education & Children Services
- Head of Finance / Section 151 Officer
- Corporate Health & Safety Manager
- Programme Manager – Business Change
- Principal Manager – Modernising Education
- Planning & Resources Manager (Education)
- Healthy Schools Co-ordinator
- Scrutiny Co-Ordinator
- Chair – Performance Scrutiny Committee
- Lead Member for Finance, Corporate Plan & Performance
- Lead Member for Finance, Performance & Strategic Assets
- Corporate Governance Committee
- Strategic Planning & Performance Officer

Internal Audit Team

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| Samantha Davies | Senior Auditor | 01824 708086 samantha.davies@denbighshire.gov.uk |
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Key Dates

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| Follow up review commenced | October 2019 |
| Follow up review completed | November 2019 |
| Reported to Corporate Governance Committee | 20 th November 2019 |